

quinn emanuel trial lawyers | new york

51 Madison Avenue, 22nd Floor, New York, New York 10010-1601 | TEL (212) 849-7000 FAX (212) 849-7100

WRITER'S DIRECT DIAL NO.
(212) 849-7617

WRITER'S EMAIL ADDRESS
danielkoffmann@quinnemanuel.com

June 18, 2020

VIA ECF

Hon. Richard M. Berman
United States District Judge,
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: United States v. Owens, et al., 18 Cr. 693 (RMB)

Dear Judge Berman:

We write respectfully on behalf of Defendant Harald Joachim von der Goltz to request a limited modification to the conditions of his pretrial release. At present, those conditions include, among other things, a \$650,000 fully secured cash bond. Mr. von der Goltz respectfully requests that \$440,000 of that cash be released and in its place, that Mr. von der Goltz's wife be permitted to become a suretor of the bond and to pledge her interest in a residence in Massachusetts as additional security. If the Court grants this request, the \$440,000 will be transferred to the government as partial satisfaction of the Consent Preliminary Order of Forfeiture that this Court entered on June 2, 2020. *See* Dkt. No. 218.

We have conferred with counsel for the government, who have no objection to this request. Accordingly, Mr. von der Goltz respectfully requests that the Court modify his conditions of release as outlined above.

Respectfully submitted,

/s/ Daniel Koffmann
Daniel Koffmann

cc: All counsel of record

On consent, modification granted as set forth in this letter.

SO ORDERED:
Date: 7/9/2020

Richard M. Berman
Richard M. Berman, U.S.D.J.

quinn emanuel urquhart & sullivan, llp

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